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Mar. 29, 2022

**VIA ECF**

Hon. Barbara Moses, U.S.M.J.  
United States District Court  
Southern District of New York  
500 Pearl St., Room 740  
New York, NY 10007

Re: Michelo et al. v. Nat'l Collegiate Student Loan Trust 2007-2 et al., 18-CV-1781  
Bifulco et al. v. Nat'l Collegiate Student Loan Trust 2004-2 et al., 18-CV-7692

Dear Judge Moses:

We represent Plaintiffs in the above-referenced cases. Pursuant to Part III of the Court's Individual Rules of Practice for Civil Cases, Plaintiffs request permission to file a document under seal in connection with their renewed Motion for Sanctions against TSI concerning Employee A. The document is Exhibit D to the Asher Hawkins Declaration in support of this Motion.

The document in question, a redacted copy of which has been filed at Dkt. No. 367-4 in Case No. 18-cv-1781, contains confidential private information concerning Plaintiff Tabar and/or a Class member in the instant litigation, and also shows the name of Employee A.

Plaintiffs are now filing an unredacted copy of the document, under seal.

Plaintiffs therefore request that the unredacted copy of the document remain under seal per Your Honor's Individual Rules.

Respectfully submitted,

/s/ Gregory A. Frank

cc: all counsel (via ECF)